

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                |   |                           |
|----------------|---|---------------------------|
| _____          | ) |                           |
| UNITED STATES  | ) |                           |
|                | ) |                           |
| v.             | ) | CRIM. NO. 13-CR-10017-JLT |
|                | ) |                           |
| JERRY CORREIA, | ) |                           |
|                | ) |                           |
|                | ) |                           |
| Defendants     | ) |                           |
| _____          | ) |                           |

**DEFENDANT'S MOTION TO CONTINUE  
DETENTION HEARING TO MARCH 8, 2013**

Defendant Jerry Correia respectfully requests that the Court continue his Detention Hearing currently scheduled for February 27, 2013 to March 8, 2013 at 2:00 P.M. for the following reasons:

1. In preparing for the detention hearing, defense counsel has been investigating conditions of release that may satisfy this Court. However, she needs additional time to meet with Mr. Correia's family and work through some details of her proposal.
2. To date, defense counsel has not been able to reach the Mr. Correia's Suffolk Superior Court probation officer Jean Chandler to find out her office's position concerning the defendant's release.

3. Defense counsel requests a continuance of the Detention Hearing until March 8, 2013 so that she can complete her preparations on Mr. Correia's behalf.
4. Upon information and belief, Detention Hearings for other co-defendants currently are scheduled for March 8, 2012, including Martinho Rodrigues.
5. Mr. Correia consents to the exclusion of this additional time from speedy trial calculations in the interests of justice.

WHEREFORE, the defendant respectfully requests that the Court allow his motion.

Dated: February 26, 2013

Respectfully submitted,  
Jerry Correia,  
By his attorney,

Debra A. DelVecchio  
Debra A. DelVecchio  
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion was served upon all of the parties in this case via the United States District Court electronic filing system this 26<sup>th</sup> day of February, 2013.

Debra A. DelVecchio  
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